

Exhibit G

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 -----x

5 MANBRO ENERGY CORPORATION,
6 individually and on behalf of
7 all those similarly situated,

8 Plaintiffs, Case No.
9 v. 20 Civ. 3773 (LGS)

10 CHATTERJEE ADVISORS, LLC,
11 CHATTERJEE FUND MANAGEMENT, LP,
12 CHATTERJEE MANAGEMENT COMPANY,
13 d/b/a THE CHATTERJEE GROUP, and
14 PURNENDU CHATTERJEE,

15 Defendants.

16 -----x

17
18 *** CONFIDENTIAL ***

19
20 REMOTE DEPOSITION OF JOSEPH CARY

21 TAKEN BY VIDEOCONFERENCE

22 June 25, 2021

23 Reported by:

24 Anne E. Vosburgh, CSR-6804, RPR, CRR

25 Job No. 195767

<p style="text-align: right;">Page 302</p> <p>1 J. Cary - Confidential</p> <p>2 potential settlement strategies?</p> <p>3 A. I don't recall. I know we</p> <p>4 certainly received estimated values based on</p> <p>5 specific settlement amounts, you know, trying</p> <p>6 to estimate, again, costs and potential</p> <p>7 returns.</p> <p>8 I can't remember -- I can't recall</p> <p>9 if he sent like different potential</p> <p>10 settlement paths, something that was written.</p> <p>11 Q. When did your discussions with</p> <p>12 Emissary concerning potential settlement</p> <p>13 strategy occur?</p> <p>14 A. Since we started talking to them.</p> <p>15 I mean, obviously, they had to build up their</p> <p>16 knowledge of the case before we really had</p> <p>17 talks, so maybe two or three months after we</p> <p>18 engaged or something like that.</p> <p>19 Q. Are there any email exchanges</p> <p>20 between yourself and Matt McGrath, just the</p> <p>21 two of you?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know if there are email</p> <p>24 exchanges between Jon McCloskey and</p> <p>25 Matt McGrath, just the two of them?</p>	<p style="text-align: right;">Page 303</p> <p>1 J. Cary - Confidential</p> <p>2 A. I do not.</p> <p>3 Q. So it's fair to say that counsel</p> <p>4 was not always present or included on</p> <p>5 communications with Emissary Holdings, right?</p> <p>6 A. Yes.</p> <p>7 Q. Did Emissary Holdings make a</p> <p>8 preliminary estimate of the value of Manbro's</p> <p>9 investment in WPPE?</p> <p>10 A. They did some work on the valuation</p> <p>11 of Haldia.</p> <p>12 Q. And that's the valuation estimate</p> <p>13 that you referred to?</p> <p>14 A. Yes.</p> <p>15 Q. And that preliminary estimate was</p> <p>16 provided to you in written work product,</p> <p>17 correct?</p> <p>18 A. I'm assuming. It's been a couple</p> <p>19 of years.</p> <p>20 Q. What information did Emissary</p> <p>21 Holdings rely on in making its preliminary</p> <p>22 estimate?</p> <p>23 A. I don't recall what information</p> <p>24 they used to make -- comparables, maybe. I</p> <p>25 just can't be sure.</p>
<p style="text-align: right;">Page 304</p> <p>1 J. Cary - Confidential</p> <p>2 Q. Would it have been only publicly</p> <p>3 available information or would --</p> <p>4 A. Yeah.</p> <p>5 Q. Only publicly available</p> <p>6 information?</p> <p>7 A. Right.</p> <p>8 Q. Did you discuss this preliminary</p> <p>9 estimate of valuation with anyone at Parkwood</p> <p>10 besides Mr. McCloskey?</p> <p>11 A. Potentially Rob and Brad.</p> <p>12 Q. Anyone else?</p> <p>13 A. No.</p> <p>14 Q. Do you recall when those</p> <p>15 conversations occurred?</p> <p>16 A. The investment team, I should say.</p> <p>17 I should just clarify. I'm sure that as it</p> <p>18 went along we discussed the valuation, but I</p> <p>19 don't know over what period. It was the team</p> <p>20 in general. But just in passing.</p> <p>21 Q. Do you recall when those</p> <p>22 conversations occurred?</p> <p>23 A. 2019, 2020.</p> <p>24 Q. Has Emissary Holdings provided</p> <p>25 Manbro any services relating to the media?</p>	<p style="text-align: right;">Page 305</p> <p>1 J. Cary - Confidential</p> <p>2 A. The PR firm.</p> <p>3 Q. Does the name Reevemark ring a</p> <p>4 bell?</p> <p>5 A. Yeah. Thank you.</p> <p>6 Q. Is that the PR firm that was</p> <p>7 retained?</p> <p>8 A. Yeah.</p> <p>9 Q. Did Emissary Holdings devise a</p> <p>10 media strategy for Manbro relating to this</p> <p>11 lawsuit?</p> <p>12 A. In conjunction with Reevemark.</p> <p>13 Q. Do you know when Reevemark was</p> <p>14 retained?</p> <p>15 A. I don't know the specific dates,</p> <p>16 no.</p> <p>17 Q. Would it have been before the</p> <p>18 complaint in this action was filed?</p> <p>19 A. Before the filing of the -- yeah.</p> <p>20 I'd have to look at the agreement. I'm not</p> <p>21 certain when. I'm assuming it was somewhere</p> <p>22 around that time. I think before. I'd have</p> <p>23 to look at the contract with Reevemark.</p> <p>24 Q. Who at Emissary Holdings was</p> <p>25 involved in the media strategy creation?</p>

<p style="text-align: right;">Page 310</p> <p>1 J. Cary - Confidential</p> <p>2 India could have changed it, edited it,</p> <p>3 modified it after that, correct?</p> <p>4 MR. MCDONALD: Objection.</p> <p>5 A. I have not compared them, yes.</p> <p>6 (Off-the-record discussion held.)</p> <p>7 BY MR. CHERRY:</p> <p>8 Q. Do you know if a fully drafted</p> <p>9 article was provided to Telegraph India?</p> <p>10 A. I don't know if a fully drafted</p> <p>11 article was provided to Telegraph India.</p> <p>12 Q. But the article was provided by</p> <p>13 Reevemark to Telegraph India, correct?</p> <p>14 MR. MCDONALD: Objection.</p> <p>15 A. I understand. I didn't know if you</p> <p>16 meant the full draft of this article. So</p> <p>17 like I said, I haven't compared the two side</p> <p>18 by side. I don't know if anything was</p> <p>19 changed or added.</p> <p>20 BY MR. CHERRY:</p> <p>21 Q. Was the goal of this article to</p> <p>22 create negative publicity around</p> <p>23 Dr. Chatterjee related to filing of the</p> <p>24 lawsuit?</p> <p>25 A. No. It was to raise awareness.</p>	<p style="text-align: right;">Page 311</p> <p>1 J. Cary - Confidential</p> <p>2 Q. The goal was to raise awareness of</p> <p>3 the lawsuit in India?</p> <p>4 A. I'm sorry. I will answer your</p> <p>5 question in just a second. I've got to go.</p> <p>6 MR. MCDONALD: Do you want to go</p> <p>7 off the record, Counsel?</p> <p>8 MR. CHERRY: Let's go off the</p> <p>9 record.</p> <p>10 THE VIDEOGRAPHER: Going off the</p> <p>11 record at 4:18 p.m.</p> <p>12 (Recess taken.)</p> <p>13 THE VIDEOGRAPHER: We're back on</p> <p>14 the record at 4:19 p.m. This marks the</p> <p>15 beginning of media 6.</p> <p>16 BY MR. CHERRY:</p> <p>17 Q. Mr. Cary, I'll return to the last</p> <p>18 question asked: The goal of this article was</p> <p>19 to raise awareness of the lawsuit in India?</p> <p>20 A. Yeah.</p> <p>21 Q. Why did Manbro view it as important</p> <p>22 to raise awareness of the lawsuit in India?</p> <p>23 A. To encourage settlement.</p> <p>24 Q. How would awareness of the lawsuit</p> <p>25 encourage settlement?</p>
<p style="text-align: right;">Page 312</p> <p>1 J. Cary - Confidential</p> <p>2 A. So if they were more aware that we</p> <p>3 were pursuing this, they would be more likely</p> <p>4 to reach out to Dr. Chatterjee.</p> <p>5 Q. Did you believe that Dr. Chatterjee</p> <p>6 wasn't aware of the lawsuit before the</p> <p>7 article was published?</p> <p>8 MR. MCDONALD: Objection.</p> <p>9 A. I believe he was moderately aware.</p> <p>10 He was somewhat aware, but he wasn't tuned in</p> <p>11 to it.</p> <p>12 BY MR. CHERRY:</p> <p>13 Q. You thought that the filing of this</p> <p>14 article would make Dr. Chatterjee take the</p> <p>15 lawsuit more seriously?</p> <p>16 A. That was potentially the hope, but</p> <p>17 ultimately the goal is settlement, to</p> <p>18 encourage a sitdown to negotiate a mutually</p> <p>19 beneficial outcome.</p> <p>20 Q. And how would this article</p> <p>21 encourage Dr. Chatterjee to settle the case?</p> <p>22 MR. MCDONALD: Objection.</p> <p>23 A. He would see it and wonder what it</p> <p>24 was, take more interest in the transaction,</p> <p>25 and potentially reach out.</p>	<p style="text-align: right;">Page 313</p> <p>1 J. Cary - Confidential</p> <p>2 BY MR. CHERRY:</p> <p>3 Q. Did you understand that this</p> <p>4 article would result in negative publicity in</p> <p>5 India for Dr. Chatterjee?</p> <p>6 A. I didn't, actually. Negative or</p> <p>7 positive -- I don't know if it was negative</p> <p>8 or positive. We were just hoping to</p> <p>9 encourage settlement.</p> <p>10 Q. And your only goal in encouraging</p> <p>11 settlement was to make Dr. Chatterjee aware</p> <p>12 of this lawsuit?</p> <p>13 A. Make him aware, yes. More aware.</p> <p>14 Q. Why did you believe he wasn't aware</p> <p>15 before the filing of this article?</p> <p>16 MR. MCDONALD: Objection. It's</p> <p>17 been asked and answered.</p> <p>18 MR. CHERRY: It has not been asked</p> <p>19 and answered.</p> <p>20 BY MR. CHERRY:</p> <p>21 Q. Please go ahead, Mr. Cary.</p> <p>22 MR. MCDONALD: It has been asked</p> <p>23 and answered. You didn't like the</p> <p>24 answer. That doesn't mean you get to</p> <p>25 ask it again.</p>

<p style="text-align: right;">Page 314</p> <p>1 J. Cary - Confidential</p> <p>2 MR. CHERRY: Mr. McDonald, I asked</p> <p>3 a different question this time. I'm</p> <p>4 asking why he believes Mr. Chatterjee</p> <p>5 was not aware. That has not been asked</p> <p>6 before. You can check the transcript.</p> <p>7 BY MR. CHERRY:</p> <p>8 Q. Mr. Cary, please answer.</p> <p>9 MR. MCDONALD: It has been</p> <p>10 answered.</p> <p>11 Mr. Cary, don't feel like you need</p> <p>12 to change your answer because Mr. Cherry</p> <p>13 asked the same question again.</p> <p>14 A. Why did I think he wasn't aware?</p> <p>15 Was that your question? Because we hadn't</p> <p>16 settled.</p> <p>17 BY MR. CHERRY:</p> <p>18 Q. Was it your understanding that</p> <p>19 Dr. Chatterjee would only be aware of the</p> <p>20 lawsuit when he had settled the lawsuit?</p> <p>21 A. No. I think he would be more aware</p> <p>22 with this article so that we could</p> <p>23 potentially settle.</p> <p>24 Q. What about his conduct before</p> <p>25 publication of this article made you believe</p>	<p style="text-align: right;">Page 315</p> <p>1 J. Cary - Confidential</p> <p>2 that he wasn't sufficiently aware of the</p> <p>3 lawsuit?</p> <p>4 A. So we hadn't settled and there</p> <p>5 didn't appear to be any willingness to even</p> <p>6 sit down and settle. There had been little</p> <p>7 communication. They hadn't provided</p> <p>8 financials. They were generally</p> <p>9 unresponsive.</p> <p>10 Q. And so you wanted to file this</p> <p>11 article to exert pressure on Dr. Chatterjee?</p> <p>12 A. I wanted to raise awareness, yes.</p> <p>13 Q. Your goal was that if</p> <p>14 Dr. Chatterjee saw there were these</p> <p>15 publications in his home country, he would be</p> <p>16 more inclined to settle with you?</p> <p>17 A. He would be more aware and</p> <p>18 potentially more inclined, yes.</p> <p>19 Q. Did Manbro -- does Manbro or</p> <p>20 Parkwood have any employees or officers in</p> <p>21 India?</p> <p>22 A. Not to the best of my knowledge.</p> <p>23 Q. Was Reevemark's decision to reach</p> <p>24 out to Telegraph India authorized by</p> <p>25 Parkwood?</p>
<p style="text-align: right;">Page 316</p> <p>1 J. Cary - Confidential</p> <p>2 A. Parkwood authorized them, I</p> <p>3 believe, to create a publication to raise</p> <p>4 awareness. I don't know that Telemark India</p> <p>5 was specifically on the list. It may have</p> <p>6 been or -- if there was an official list of</p> <p>7 publications that they were reaching out to.</p> <p>8 Q. Have you ever seen a communication,</p> <p>9 a written communication, between</p> <p>10 Emissary Holdings, Reevemark, or Parkwood and</p> <p>11 Telegraph India?</p> <p>12 A. No.</p> <p>13 Q. Do you understand that Reevemark</p> <p>14 would have communicated with Telegraph India</p> <p>15 via email?</p> <p>16 A. I don't.</p> <p>17 Q. Do you know how --</p> <p>18 A. I don't know how they communicated.</p> <p>19 Q. I'm sorry. Do you know how --</p> <p>20 A. I don't know how they communicated.</p> <p>21 Q. Do you know how Reevemark passed</p> <p>22 along the article it drafted to Telegraph</p> <p>23 India?</p> <p>24 A. I do not.</p> <p>25 Q. Fair to say that it was in written</p>	<p style="text-align: right;">Page 317</p> <p>1 J. Cary - Confidential</p> <p>2 form and not communicated verbally?</p> <p>3 MR. MCDONALD: Objection.</p> <p>4 A. I can't know that. How would I</p> <p>5 know that?</p> <p>6 BY MR. CHERRY:</p> <p>7 Q. You mentioned earlier a potential</p> <p>8 list of publications. Was there a list of</p> <p>9 publications that was being discussed to</p> <p>10 advance the media strategy in this case?</p> <p>11 A. We verbally discussed some. That's</p> <p>12 what I recall, but I don't recall which</p> <p>13 specific media outlets we discussed.</p> <p>14 Q. Do you recall if any other outlets</p> <p>15 were approached by Reevemark or</p> <p>16 Emissary Holdings?</p> <p>17 A. I don't know what other outlets</p> <p>18 were approached by Reevemark. I don't</p> <p>19 believe that Emissary Holdings ever</p> <p>20 approached any of them, but that's the best</p> <p>21 of my knowledge.</p> <p>22 Q. You know Reevemark approached</p> <p>23 Telegraph India, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Do you know if any other</p>

1 J. Cary - Confidential
2 Q. What about the investment in [REDACTED]
3 [REDACTED]
4 A. Me.
5 Q. And the investment in [REDACTED]
6 A. Me.
7 Are you asking me to search for
8 these investments and tell you about them?
9 Q. No, Mr. Cary. I'm just asking you
10 who would be the best person to ask about
11 these investments at Parkwood.
12 A. I am the primary contact for all
13 hedge fund-related investments.
14 Q. And the same is true for [REDACTED]

17 A. I would assume so, yes.
18 Q. But sitting here today, without
19 having done that independent research, you
20 don't have further information about those
21 investments, correct?
22 A. That's correct. I would have to
23 look them up.
24 Q. Earlier, Mr. Cary, you mentioned
25 efforts by an investigative firm to track

20 *Anne E. Vosburgh*
21
22 ANNE E. VOSBURGH
23 Certified Shorthand Reporter No. 6804
24 Registered Professional Reporter
25 Certified Realtime Reporter

1 J. Cary - Confidential
2 down the list of limited partners in the
3 Winston funds.
4 Do you recall that?
5 A. I do.
6 Q. Do you know if your investigative
7 firm was ever successful in tracking down
8 that list?
9 A. They were not.
10 MR. CHERRY: Nothing further from
11 us.
12 MR. MCDONALD: I have no questions.
13 We can go off the record.
14 THE VIDEOGRAPHER: Are we all set,
15 Counsel?
16 MR. CHERRY: Yes. Thank you.
17 THE VIDEOGRAPHER: This concludes
18 today's testimony of Joseph Cary. We
19 are going off the record at 5:20 p.m.
20 This also concludes media 6.
21 (The deposition was concluded at
22 5:20 p.m.)
23
24
25

1 J. Cary - Confidential

2 Case Name:

3 Deposition Date:

4 Deponent:

5 Pg. No. Now Reads Should Read Reason

6 _____

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22 _____ Signature of Deponent

23 SUBSCRIBED AND SWORN BEFORE ME

24 THIS _____ DAY OF _____, 2021.

25 (Notary Public) MY COMMISSION EXPIRES: